

1 RENE L. VALLADARES
Federal Public Defender
2 MONIQUE KIRTLEY
Assistant Federal Public Defender
3 411 E. Bonneville, Ste. 250
Las Vegas, Nevada 89101
4 (702) 388-6577/Phone
(702) 388-6261/Fax
5 Monique_Kirtley@fd.org

6 Attorney for Paulino Nicolas-De La Cruz

7
8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 v.

13 PAULINO NICOLAS-DE LA CRUZ,

14 Defendant.
15
16

Case No. 2:17-cr-00128-JCM-PAL

STIPULATION TO CONTINUE
REVOCATION OF SUPERVISED
RELEASE HEARING
(Second Request)

17 IT IS HEREBY STIPULATED AND AGREED, by and between Steven W. Myhre, Acting
18 United States Attorney, and Kathryn C. Newman, Assistant United States Attorney, counsel for
19 the United States of America, and Rene L. Valladares, Federal Public Defender, and
20 Monique Kirtley, Assistant Federal Public Defender, counsel for Paulino Nicolas-De La Cruz, that
21 the Revocation of Supervised Release hearing currently scheduled for Thursday, June 1, 2017 at
22 10:30 a.m., be vacated and set to a date and time convenient to this Court but no sooner than seven
23 (7) days.

24 The Stipulation is entered into for the following reasons:

- 25 1. Counsel will be out of the district during the currently scheduled Revocation of
26 Supervised Release hearing date.
27 2. The client is in custody and does not oppose the continuance.

1 3. Denial of this request for continuance would deny counsel for the defendant
2 sufficient time to effectively review and investigate the allegations in the petition, in the event the
3 parties are unable to reach a global resolution.

4 4. Additionally, denial of this request for continuance could result in a miscarriage of
5 justice.

6 This is the second stipulation to continue filed herein.

7 DATED this 16th day of May, 2017.

8 RENE L. VALLADARES
9 Federal Public Defender

STEVEN W. MYHRE
Acting United States Attorney

10 */s/ Monique Kirtley*
11 By _____
12 MONIQUE KIRTLEY
Assistant Federal Public Defender

/s/ Kathryn C. Newman
By _____
KATHRYN C. NEWMAN
Assistant United States Attorney

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 PAULINO NICOLAS-DE LA CRUZ,

7 Defendant.
8
9

Case No. 2:17-cr-00128-JCM-PAL

ORDER

10 Based on the pending Stipulation of counsel, and good cause appearing,

11 IT IS THEREFORE ORDERED that the Revocation of Supervised Release Hearing
12 currently scheduled on Thursday, June 1, 2017 at 10:00 a.m. be vacated and continued to
13 **Tuesday, June 27, 2017 at 10:30 a.m.**

14 DATED May 18, 2017.

15 
16 UNITED STATES DISTRICT JUDGE
17
18
19
20
21
22
23
24
25
26
27